REMARKS

Reconsideration of this application is respectfully requested. Claims 1 and 6 have been amended and claims 1-9 are pending.

In the Office Action, the Examiner responds to applicant's amendment and comments by stating that they have been considered, but not deemed to be persuasive. At paragraph 5, the Examiner reiterates the rejection of claims 1 to 9 as discussed in the previous Office Action and rejects the newly-submitted amended claims by referring very generally to the summary of the invention of DOCKTER et al. appearing at column 2, line 1 through column 3, line 50. However, for the reasons set forth below the cited prior art does suggest or disclose the invention defined by the present claims.

Discussion of prior art of DOCKTER

DOCKTER, at column 2, lines 15 and following, very generally describes the problem met by a person wishing to locate information either in a local or distributed database which contains enormous volumes of information.

There is no teaching or suggestion in this passage of DOCKTER of a central and private consumer repository containing a plurality of true objective consumption profiles as called for in claim 1:

> "at least one central product repository containing consumption object
> profiles for a plurality of consumption objects each of which are industry
> relative wherein industry participants register profiles of the products and
> services within the product repository."

DOCKTER also does not teach "correlating means for correlating parameters of a potential target consumption object with parameters of a given consumer's true consumption profile and means for confidentially presenting the consumer with the profile of the at least one best match consumption object."

Instead, DOCKTER is concerned with a facility for the intelligence selection of information object, but as clearly stated in the field of the invention (column 1, line 5 and following), "... More specifically, the present invention relates to a method to determine a value of selected subsets of multi-media based on a user's subjective preferences."

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It is important to underline that DOCKTER is concerned with a system to permit the classification of the value of information based on a user's subjective preferences. In DOCKTER, the user himself adjusts his preferences and the system uses these preferences to return a list of information with a weighted value. DOCKTER is mostly concerned with a system in which a person is seeking information in general and the sources of the most relevant information. There is no teaching or suggestion in DOCKTER of <u>objectively</u> rating the preferences of the user based on a consumption profile, nor does DOCKTER teach the use of at least one central product repository.

In the context of the present invention, each central product repository as called for in claim 1 is industry relative. This means that each of the at least one central product repository is associated with a given industry. For example, the present invention contemplates a central product repository dealing with motor vehicles and/or another dealing with television. The present invention thus contemplates a number of central product repositories each being associated with a given industry and each containing profiles of products and services provided by industry participants within each product repository and each of the repositories containing only entry profiles of the items registered. The Examiner will note that in this particular case and as claimed in claim 1, the registration of the profile with a central product repository is quite different from simply uploading information on the Internet with respect to a particular product of a class of products. Registration means more than just freely providing information. It means that the information is ordered and is provided by industry participants that, at minimum, have a certain degree of legitimacy with respect to the products and services. This is completely different from the Internet where there is no control over the legitimacy of the profiles or even the accuracy of the information provided thereon.

Finally, nowhere in DOCKTER is it taught or suggested that the system of DOCKTER includes means for confidentially presenting said consumer with the profile of said at least one best-matched consumption object so that said industry participant cannot identify said consumer as called for in the present claims.

The Examiner has also failed to correlate the combination of DOCKTER and McDONALD. In the Office Action of May 25, 2007, the Examiner, at page 2 of that Office Action, does make reference to McDONALD.

However, at page 3 of the Office Action, the Examiner refers to ABELOW which is a reference cited in the "Notice of References Cited" accompanying the Office Action of June 30, 2006, but other than that, not referred to in the Office Action.

Since the Examiner has concentrated the most recent Office Action on the McDONALD reference, it is respectfully submitted that McDONALD cannot overcome the deficiencies of DOCKTER. First of all, DOCKTER is deficient in teaching the various aspects of the present invention in that it does not provide for a system for anonymously matching consumption objects with a consumer consumption behaviour identified by a true objective behaviour derived consumption profile.

It does not comprise at least one central product repository which is industry relative and associated with a given industry.

It does not provide correlating means for correlating parameters of a potential target consumption object with parameters of a given consumer's true consumption profile and it does not provide means for confidentiality presenting the consumer with the profile of the at least one best-matched consumption object so that the industry participant cannot identify the consumer.

As mentioned previously, DOCKTER is directed to a system for intelligently linking a computer to an enormous database of multimedia information and provides an automated facility for determining the value of information based on a user's subjective preferences.

There is no teaching or suggestion or any motivation in DOCKTER to go beyond the disclosure of DOCKTER to arrive at a system as called for in the various independent claims of the present invention.

Even assuming that there was such a motivation, a person skilled in the art would not look to McDONALD to overcome the deficiencies of DOCKTER.

McDONALD is a mortgage loan data collection method and apparatus for the financial sector. As clearly stated in paragraph 3, McDONALD identifies the Real Estate Settlement

Procedures Act (RESPA) in the United States and attempts to provide a solution to the objectives identified by this Act. There is no true objective behavior derived consumption profile that is anonymous and there is no central product repository containing consumption object profiles for a plurality of consumption objects as called for in claim 1. There may be generally means for correlating in McDONALD, but not as claimed for the present invention and there are no means disclosed for confidentially presenting the consumer of the profile of the at least one best-matched consumption object.

Indeed, such would be contrary to the McDONALD disclosure since McDONALD does address one of the objectives of the "RESPA" by providing advanced disclosure to home buyers and sellers of loan settlement costs. In fact, "RESPA" provides for greater transparency in the whole mortgage loan data collection method and therefore, there can be no question of anonymity or confidentiality in the sense of the present claims.

It is respectfully submitted that the Examiner has failed to make a *prima facie* case of obviousness and the claims as amended are allowable over the art of record. Withdrawal of the rejection under 35 U.S.C. §103 and issuance of a Notice of Allowance is believed to be in order.

Dated: November 26, 2007   Respectfully submitted,

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